

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

In the Matter)	
)	
Federal Communications Commission)	
)	WC Docket 06-55
Time Warner Cable's Petition for Declaratory)	
Ruling that Competitive Local Exchange)	
Carriers may Obtain Interconnection to)	
Provide Wholesale Telecommunications)	
Services to VoIP Providers)	
)	

COMMENTS OF THE IOWA UTILITIES BOARD

The Iowa Utilities Board (IUB) submits these comments in response to the Public Notice inviting comments on Time Warner Cable's (TWC's) petition for declaratory ruling. On March 6, 2006, the FCC released a Pleading Cycle concerning TWC's request for the FCC to affirm that competitive local exchange carriers (LECs) are entitled to interconnect with incumbent LECs pursuant to Section 251 of the Communications Act of 1934, as amended, for the purpose of exchanging traffic on behalf of VoIP-based providers.

On page 8 of its petition, TWC cited the IUB's decision in Docket No. ARB-05-2 recognizing Sprint as a telecommunications carrier entitled to obtain interconnection on behalf of a cable company customer. The IUB respectfully submits two other orders that reflect the IUB's position on the treatment of VoIP providers and the regulatory flexibility it is striving to maintain. These orders are

Order in Lieu of Certificate issued June 20, 2005, concerning Level 3 Communications in Docket No. TF-05-31 (TCU-99-1) and *Order Canceling Certificate and Issuing Order in Lieu of Certificate* concerning Sprint issued on March 3, 2006, in Docket No. SPU-05-21.

April 10, 2006

Respectfully submitted,

Iowa Utilities Board
350 Maple Street
Des Moines, Iowa 50319
Voice: (515) 281-4034
Fax: (515) 281-5329
E-mail: john.ridgway@iub.state.ia.us

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John Ridgway
Telecommunications Mgr.